

2. Selective's inclusion of approximately four (6) additional pages to adequately address the foregoing will not impose any burden on Defendant's ability to respond to Selective's cross motion for summary judgment, nor result in the unnecessary or duplicative filing of materials with the Court.

WHEREFORE, Plaintiffs respectfully request that the Court grant Selective leave to file the accompanying Memorandum in excess of the 20-page limitation set forth in Local Rule 7.1(B)(4).

Dated: December 21, 2020

Respectfully submitted,

SELECTIVE INSURANCE COMPANY OF THE
SOUTHEAST, and SELECTIVE INSURANCE
COMPANY OF AMERICA,

By their Attorneys,

/s/ Barbara O'Donnell

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants identified on the Notice of Electronic Filing (NEF) with paper copies sent to any non-registered participants on this 21st day of December 2020.

/s/ Barbara O'Donnell

Barbara O'Donnell